

**IN THE  
UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	Criminal No. 1:15-CR-0182
	:	
v.	:	(Judge Kane)
	:	
DOMINICK PUGLIESE	:	Electronically filed

**MOTION FOR DISCLOSURE OF  
DEFENDANT’S LOCATION AND MEDICAL RECORDS**

Pursuant to the Federal Rules of Criminal Procedure and the Rules of this Court, the defendant hereby moves for disclosure of the defendant’s location and medical records, averring in support as follows:

1. The defendant was convicted of conspiracy to distribute controlled substances and possession of a firearm in furtherance of drug trafficking, and sentenced on September 28, 2016, to a term of imprisonment of 235 months. Doc. 165.

2. Undersigned counsel, as attorneys with the Federal Public Defender’s Office of the Middle District of Pennsylvania, were appointed by this Court on January 20, 2021, to represent the defendant in connection with a motion for compassionate release under 18 U.S.C. § 3582(c)(1)(A) (Doc. 278).

3. Since being appointed, undersigned counsel has been unable to locate or communicate with the defendant, who has reportedly been transferred from his institution to a hospital for medical treatment (Doc. 291); the U.S. Bureau of Prisons

will not disclose any information about the defendant, including his location or medical records, to undersigned counsel without signed releases from the defendant or administrative or judicial order.

4. Because it appears that the defendant is in an unknown hospital and possibly not able to sign releases to permit undersigned counsel to obtain his medical records or any other information, and because time is of the essence, undersigned counsel is requesting that this Court direct the government to obtain and disclose the defendant's location and medical records to undersigned counsel forthwith, as has been done in other cases. *See, e.g., United States v. Martin*, No. 3:13-CR-0050-MEM, ECF Nos. 153, 154 (M.D. Pa. May 20, 2020); *United States v. Tristan Green*, No. 1:11-CR-00361-CCC, ECF No. 276 at 17 (M.D. Pa. Jan. 26, 2021).

5. The grounds for this motion are fully set forth in the brief in support.

WHEREFORE, counsel for the defendant respectfully requests that this motion be granted, and that the proposed order be entered.

Date: January 27, 2021

Respectfully submitted,

/s/ Quin M. Sorenson  
HEIDI R. FREESE, ESQ.  
Federal Public Defender  
Middle District of Pennsylvania  
QUIN M. SORENSON, ESQ.  
Assistant Federal Public Defender  
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*Counsel for Defendant*

## **CERTIFICATE OF SERVICE**

I, Quin M. Sorenson, Esquire, of the Federal Public Defender's Office, do hereby certify that on the date below I served a copy of the foregoing filing, via electronic case filing, addressed to the following:

William A. Behe, Esquire  
United States Attorney's Office  
*william.behe@usdoj.gov*

Date: January 27, 2021

/s/ Quin M. Sorenson  
QUIN M. SORENSON, ESQUIRE  
Assistant Federal Public Defender